

From: [MCCLINCY Matt](#)
To: [DeMaria, Eva](#)
Cc: [LARSEN Henning](#); [POULSEN Mike](#); ["ROMERO Mike"](#); [HOATSON Scott](#)
Subject: TPH C10-C12 Aliphatic Analysis
Date: Tuesday, October 18, 2016 11:28:40 AM

Hi Eva,

DEQ has been using the Volatile Petroleum Hydrocarbons (VPH) Fractions or the Extractable Petroleum Hydrocarbons (EPH) Fractions analytical methods to quantify the C10-C12 aliphatic hydrocarbon range in groundwater (e.g., Gasco and Arco). This methodology was also referenced in Burt Shephard's July 8, 2016 email to you on the subject as acceptable. As we discussed during a DEQ/EPA source control coordination meeting, the VPH/EPH method detection limit is in the 40 ug/L range. During that discussion, I mentioned that DEQ had initiated discussions with a contract lab that believed they could achieve the Portland Harbor PRG of 2.6 ug/L via a modification of the VPH/EPH analytical method by substituting the FID detector with a MS detector. At that time you indicated that EPA would want to be involved in the review of any method modification. We agreed that DEQ would provide EPA with the background information that we had developed, and EPA would look into a method modification that to achieve the Portland Harbor PRG.

There subsequently was some internal confusion on the DEQ side as to the path forward on the modification of the method. As part of the Kinder Morgan Linnton proposed pore-water work plan DEQ, CH2M Hill and Apex Labs reinitiated the discussion of method modification. Before this proceeds any further, we need input from EPA on the following:

1. Is EPA OK with the DEQ Lab working with APEX to approve a method modification and then providing it to EPA for review or does EPA want to be in the lead on the method modification review? If you are OK with DEQ taking lead, it would probably be a good idea for EPA to be concurrently coordinating with the DEQ Lab for efficiency.
2. Equivalent versus True carbons – The lab is requesting clarification as to what carbons are to be measured. I will forward an email chain on this. DEQ believes it should be equivalent carbons. However, this was not Burt's position (at least initially), and I do not believe we ever resolved/documented it.
3. Project Time Frame – Is approval of modified analytical method something that EPA can realistically work through in the next two weeks? If not, DEQ and EPA need to provide assurance to Kinder Morgan that we are ok using data from the VPH/EPA method to support regulatory decisions associated with the proposed data set and that we won't require future pore-water testing with a modified method to revisit associated decisions. This would not apply to a future performance monitoring program if it is determined that a source control measure is required for the dissolved TPH plume at the site.

I will forward a couple of current email chains as well as the previous one reference above. Once you have had a chance to review please give me a call so to discuss how to proceed.

Thanks,

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